

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Richmond Division

SUNTRUST MORTGAGE, INC.,

Plaintiff,

v.

UNITED GUARANTY RESIDENTIAL
INSURANCE COMPANY OF NORTH
CAROLINA, INC.,

Defendant.

Civil Action No. 3:09cv00529-REP

**SUNTRUST MORTGAGE, INC.’S MOTION *IN LIMINE* TO PRECLUDE UNITED
GUARANTY’S INTRODUCTION OF PAROL EVIDENCE FOR PURPOSES OF
ALTERING THE MEANING OF THE PARTIES’ UNAMBIGUOUS WRITTEN
CONTRACTUAL AGREEMENTS**

Plaintiff SunTrust Mortgage, Inc. (“SunTrust”), by counsel, pursuant to the Court’s Order entered November 19, 2010 (Doc. 297) and Local Rule 7, files this Motion *in Limine* to preclude Defendant United Guaranty Residential Insurance Company of North Carolina, Inc. (“United Guaranty”) from introducing or otherwise utilizing at trial evidence of any purported parol agreement contrary to the parties’ written contractual agreements. The grounds for this Motion are more fully set forth in SunTrust’s Brief in Support of this Motion filed herewith.

SunTrust requests that the Court grant its Motion and enter an order precluding United Guaranty from introducing evidence of or referring to at the trial of this matter any alleged parol agreement between Ms. Gavin and Ms. Pettitt regarding governing underwriting guidelines for purposes of insurance under the parties’ insurance contract, including any evidence or reference to the Gavin spreadsheets, or any other purported parol agreement contrary to the parties’ written

contractual agreements. SunTrust further requests that the Court grant to it such other additional relief as the Court may deem appropriate.

Dated: February 11, 2011

Respectfully submitted,

SUNTRUST MORTGAGE, INC.
By Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on this 11th day of February, 2011, a true and correct copy of the foregoing was served through CM/ECF, which will then send a notification of such filing to the following:

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